

**THE UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF MISSOURI
WESTERN DIVISION**

MICHAEL AND SHELLIE GILMOR,
et al.,

Plaintiffs,

vs.

PREFERRED CREDIT CORPORATION,
et al.,

Defendants.

Case No. 4:10-cv-00189-ODS

**PLAINTIFFS' MOTION FOR ADDITIONAL TIME TO ALLOW FOR FILING OF
MOTION FOR PRELIMINARY APPROVAL OF SETTLEMENT**

Plaintiffs respectfully requests an additional fourteen (14) days, up through and including January 25, 2013, to finalize the settlement agreement with Defendant Wilmington Trust Company ("WTC") and for Plaintiffs to file a motion seeking preliminary approvals of the class action settlement with WTC. In support of this motion, Plaintiffs state the following:

1. Plaintiffs and WTC have reached an agreement to settle the claims in this matter. The settlement agreement, if approved, will settle and resolve the claims against WTC with respect to class members who obtained second mortgage loans for which Plaintiffs seek to hold WTC liable.

2. The Court previously extended the deadline to file a motion to preliminarily approve of the class action settlement with WTC, and the current deadline for filing such motion is January 11, 2013.

3. Although the parties have been diligently working together to memorialize their settlement and implement the process through which the settlement can be finalized and

submitted to the Court for approval, Plaintiffs and WTC require additional time to finalize the agreement and prepare the necessary pleadings.

4. Plaintiffs' counsel has consulted counsel for WTC, who has indicated that WTC does not oppose the requested extension and agrees that additional time through January 25, 2013, is necessary to finalize the agreement and then prepare the required pleadings to submit the settlement to the Court for approval.

5. This motion is made in good faith and not for any improper purpose. Further, no party will be prejudiced by the requested extension of time.

WHEREFORE, Plaintiffs, for good cause shown, respectfully move the Court for an Order extending the deadline for the filing of the Motion for Preliminary Approval of the Class Action Settlement with Wilmington Trust Company to January 25, 2013, and for any other relief the Court deems just and proper.

Dated: January 11, 2013

Respectfully submitted,

WALTERS BENDER STROHBEHN
& VAUGHAN, P.C.

By: /s/ Bruce V. Nguyen

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**ATTORNEYS FOR PLAINTIFFS
AND CLASS COUNSEL**

CERTIFICATE OF SERVICE

The undersigned hereby certifies that on this the 11th day of January, 2013, I electronically filed the above and foregoing document with the Clerk of Court of the Western District of Missouri using the Court's ECF system, which will send notification of said filing to all counsel of record who are ECF participants. In addition, a copy was served by U.S. mail, First-Class Postage Prepaid, to:

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/s/ Bruce V. Nguyen